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June 5, 2015

VIA ELECTRONIC COURT FILING

The Honorable Cathy Seibel
Charles L. Brieant United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *The Wave Studio, LLC v. American Express Company*, No. 7:15-cv-03420-CS

Dear Judge Seibel:

On behalf of all parties to this action, we write to respectfully request that the pre-motion conference currently scheduled for June 18, 2014, at 11:00 a.m. regarding Defendant American Express Company's motion to consolidate be held telephonically. Plaintiff joins in this request.

Lead counsel for both Plaintiff and Defendant are located in California and Washington, D.C., respectively, and in the interest of costs and efficiency, would like to appear at the conference by telephone. For the Court's convenience, we are happy to conference the Court into the telephone call once all parties are on the line. However, if there is a regular procedure by which the Court holds telephone conferences, the parties will of course abide by that procedure and provide any necessary contact information.

Respectfully submitted,

/s/ Anthony T. Pierce

cc: All counsel of record via ECF